

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7002 0510 0002 2427 7744
RETURN RECEIPT REQUESTED**

November 11, 2003

William J. Hocevar
Facility Manager
Morgan Electro Ceramics, Inc.
232 Forbes Road
Bedford, Ohio 44146

**RECEIPT OF CORRECTIVE ACTION PLAN
FACILITY ID: 13-18-03-1627**

Dear Hocevar:

On October 10, 2003, the Cleveland Local Air Agency (CLAA) issued a Notice of Violation (NOV) requesting that Morgan Electro Ceramics, Inc. (Morgan) submit permit to install applications, a Title V permit application, Title V Fee Emissions Reports from 1996, and notifying Morgan of an emissions limitation exceedance. CLAA is in receipt of Morgan's response to this NOV, dated October 30, 2003, (10/30 Response) and requesting that CLAA withdraw the NOV since there were no violations, due to inaccuracies and misrepresentations contained within the same. CLAA has reviewed 10/30 Response and will address all issues raised within that letter in the same order.

Failure to submit a permit-to-install (PTI) application for Finishing Equipment 6342 Vapor Degreaser

Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1) prohibits any person from causing, permitting, or allowing the installation of a new source of air pollutants, or the modification of an air contaminant source, without first obtaining a PTI. In the 10/30 Response, Morgan states that it submitted a letter to Ms. Jane Bell, CLAA on February 9, 1999, stating Morgan planned on replacing emissions unit P019, a Liberty 2002-2-SP Vapor Degreaser (VPD-24) with a Finishing Equipment 6342 Vapor Degreaser. Morgan further states in this letter that based on these conversations with CLAA and the definition of modification in OAC Rule 3745-31-01(AAA), the replacement equipment would not be considered a modification.

Title 40, Part 63, Subpart T of the Code of Federal Regulations (40 CFR 63 Subpart T), Section 63.461 defines a new solvent cleaning machine to be any solvent cleaning machine constructed or reconstructed after November 29, 1993. OAC Rule 3745-31-01(ZZ) defines a new source an air contaminant source installed after January 1, 1974.

CLAA continues to agree with Morgan's statement in its February 9, 1999, letter and 10/30 Response that the Finishing Equipment 6342 Vapor Degreaser is not a modification; based on the definitions of a new source provided above, this Vapor Degreaser is a new air contaminant